

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION**

UNIVERSAL TECHNOLOGIES, INC.,)	
and JESSE E. ROGERS,)	Case No. 2:14-cv-00091
)	
Plaintiffs,)	
)	Judge Sharp
v.)	Magistrate Judge Brown
)	
FAYE CLEEK, CARLA BEAN,)	
NICHOLAS BEAN, GAYE)	JURY DEMAND
LAWDERMILK, CYNTHIA)	
MATLOCK, UNIVERSAL SERVICES &)	
SUPPLY, ARAIZA, and ARAIZA)	
COMPANY, LLC,)	
)	
Defendants.)	

**MOTION BY CONSENT OF ALL PARTIES TO MODIFY CASE MANAGEMENT
ORDER AND FOR A NEW TRIAL DATE**

Come now Plaintiffs Universal Technologies, Inc. (“UTI”) and Jesse E. Rogers, by and through counsel, and with consent of all parties, move pursuant to Federal Rule of Civil Procedure 6(b) to modify the Case Management Order (DE 75) and for a new trial date. A ninety (90) extension of all deadlines is requested due to the health condition of Jesse E. Rogers and extensive amount of discovery in this matter. Accordingly, the parties respectfully request that this Court enter an Order modifying the following deadlines:

1. The Parties shall complete all written discovery and depose all fact witnesses on or before **December 23, 2015**.
2. Plaintiffs shall identify and disclose all expert witnesses and reports on or before **January 7, 2016**.

3. Defendants shall identify and disclose all expert witnesses and reports on or before **February 4, 2016.**
4. Rebuttal experts and reports, if any, shall be identified and disclosed on or before **February 18, 2016.**
5. The Parties shall depose all expert witnesses on or before **March 10, 2016.**
6. The Parties shall file a joint mediation report on or before **February 25, 2016.**
7. The Parties shall file all dispositive motions on or before **April 7, 2016.** Responses to dispositive motions shall be filed within **twenty-one (21) days** after the filing of the motion. Optional replies shall be filed within **fourteen (14) days** after filing of the response.

The proposed amended dates will require a new trial date to comply with Local Rule 16.01, requiring at least ninety (90) days between the deadline for a reply to a dispositive motion and the trial date. (*See LR 16.01(d)(2)(f)*). After consultation among counsel for all parties, all parties consent to this motion and modification. The proposed order filed herewith reflects the requested changes.

Respectfully Submitted,

KING & BALLOW

By:/s/ Laura M. Mallory
R. Eddie Wayland, BPR 6045
R. Douglas Hanson, II, BPR 017387
Laura M. Mallory, BPR 31917
Patrick W. Ogilvy, BPR 25615
rew@kingballow.com
dhanson@kingballow.com
lmallory@kingballow.com
pogilvy@kingballow.com

Attorneys for Universal Technologies, Inc.,
and Jesse E. Rogers
315 Union Street, Suite 1100
Nashville, TN 37201
Tel: (615) 259-3456
Fax: 888-688-0482

PATTERSON INTELLECTUAL
PROPERTY LAW, P.C.

By: /s/ John F. Triggs w/permission
John F. Triggs (TN BPR #935568)
Ryan D. Levy (TN BPR #024568)
Paul C. Ney (TN BPR #011625)
Scott M. Douglass (TN BPR # 031097)
Patterson Intellectual Property Law, P.C.
1600 Division Street, Suite 500
Nashville, TN 37203
(615) 242-2400
jft@iplawgroup.com
rdl@iplawgroup.com
pcn@iplawgroup.com
smd@iplawgroup.com

*Attorneys for Defendants Faye Cleek,
Araiza, Gaye Lawdermilk and Universal
Services & Supply.*

Dru Montgomery (TX BPR # 24010800)
The Heartfield Law Firm
2195 Dowlen Road
Beaumont, TX 77706
(409) 866-3318
dru@heartfieldlawfirm.com

*Attorneys for Defendants Faye Cleek and
ARAIZA*

By: /s/ Paul Kent Bramlett w/permission
Paul Kent Bramlett
TN Sup Ct #7387/MS Sup Ct #4291
Robert Preston Bramlett
TN Sup Ct #25895
BRAMLETT LAW OFFICES
40 Burton Hills Blvd., Ste 200

P. O. Box 150734
Nashville, Tennessee 37215-0734
Telephone: 615.248.2828
Facsimile: 866.816.4116
PKNASHLAW@aol.com
Robert@BramlettLawOffices.com

Buddy D. Perry
Attorney at Law
TN Sup Ct #2662
P. O. Box 183
Winchester, Tennessee 37398
Telephone: 931.967.2676
Facsimile: 931.967.4011
BuddyDPerry@bellsouth.net

*Attorneys for Defendants Carla Bean,
Nicholas Bean, Cynthia Matlock & ARAIZA
Company, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all counsel of record by ECF on September 9, 2015.

John F. Triggs (TN BPR #935568)
Ryan D. Levy (TN BPR #024568)
Paul C. Ney (TN BPR #011625)
Scott M. Douglass (TN BPR # 031097)
Patterson Intellectual Property Law, P.C.
1600 Division Street, Suite 500
Nashville, TN 37203
(615) 242-2400

*Attorneys for Defendants Faye Cleek, Araiza,
Gaye Lawdermilk and Universal Services & Supply,*

Dru Montgomery (TX BPR # 24010800)
The Heartfield Law Firm
2195 Dowlen Road
Beaumont, TX 77706
(409) 866-3318
Attorneys for Defendants Faye Cleek and ARAIZA

Rocky Lawdermilk
2630 Liberty
Beaumont, TX 77702
Phone: (409) 838-1800
Facsimile: (409) 212-8836

Buddy D. Perry
Attorney at Law
TN Sup Ct #2662
P. O. Box 183
Winchester, Tennessee 37398
Telephone: 931.967.2676
Facsimile: 931.967.4011
*Attorneys for Defendants Carla
Bean, Nicholas Bean, Cynthia
Matlock & ARAIZA Company, LLC*

Paul Kent Bramlett
TN Sup Ct #7387/MS Sup Ct #4291
Robert Preston Bramlett
TN Sup Ct #25895
BRAMLETT LAW OFFICES
40 Burton Hills Blvd., Suite 200
P. O. Box 150734
Nashville, Tennessee 37215-0734
Telephone: 615.248.2828
Facsimile: 866.816.4116

s/ Laura M. Mallory
Laura M. Mallory